

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

In re:

ROMAN CATHOLIC DIOCESE OF
HARRISBURG,

Debtor-In-Possession

Chapter 11

Case No. 1:20-bk-00599 (HWV)

**CONCURRED IN MOTION OF THE UNITED STATES TRUSTEE FOR
AN ORDER EXTENDING THE BAR DATE FOR FILING AN OBJECTION TO
THE OFFICIAL COMMITTEE OF TORT CLAIMANTS' DISCLOSURE STATEMENT**

NOW COMES the United States Trustee, through undersigned counsel, and respectfully moves this Court to enter an Order extending the time for the United States Trustee to file an objection to the Official Committee of Tort Claimants' Disclosure Statement through and including February 22, 2022, and in support thereof, states as follows:

1. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 151, 157(a) and (b)(1) and 1334(a) and (b). This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A). Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409. The statutory predicates for this Motion are 11 U.S.C. §§ 105, 586(a)(3)(B) and 1125(a). The United States Trustee has standing pursuant to 11 U.S.C. § 307 and 28 U.S.C. § 586.

2. On February 19, 2020, the Roman Catholic Diocese of Harrisburg (the "Debtor") filed a voluntary petition for relief under Chapter 11 of Title 11 of the United States Code (the "Bankruptcy Code").

3. On January 7, 2022, the Official Committee of Tort Claimants (the "Committee") filed its Disclosure Statement, more particularly identified as Docket ID No. 907 (the "Disclosure Statement").

4. The United States Trustee is charged with certain administrative responsibilities

pursuant to 28 U.S.C. § 586(a), which includes the supervision of the administration of cases filed under the Bankruptcy Code and monitoring the progress of cases pending under the Bankruptcy Code. Id.

5. Specifically, 28 U.S.C. § 586(a)(3)(B) requires the United States Trustee to "supervise the administration of cases" by "monitoring plans and disclosure statements filed in cases under Chapter 11 of Title 11 and filing with the court, in connection with hearings under sections 1125 and 1128 of such title, comments with respect to such plans and disclosure statements;" Id.

6. The current bar date for the filing of objections to the Committee's Disclosure Statement is February 18, 2022.

7. The United States Trustee is currently reviewing the Committee's Disclosure Statement but anticipates that additional time will be required to finalize that review given the sensitive nature and complexity of the case and the likelihood that any possible objection of the United States Trustee thereto will require additional internal review within the USTP organization prior to filing.

8. By this Motion, the United States Trustee respectfully requests a brief extension of the bar date for filing an objection to the Committee's Disclosure Statement through and including February 22, 2022.

9. The Committee, through its counsel, consents to the relief sought herein.

WHEREFORE, the United States Trustee respectfully requests that the Court enter an Order extending the bar date for the United States Trustee to file an objection to the Committee's Disclosure Statement through and including February 22, 2022, and grant such other and further relief as is just and equitable.

Respectfully submitted,

ANDREW R. VARA
UNITED STATES TRUSTEE
REGIONS 3 AND 9

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